



FRESNO COUNTY RURAL TRANSIT AGENCY

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Mary Nichols, Chairperson
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Regarding: Support for the Transportation Coalition's proposal in the "Draft Concept Paper on the Cap-and-Trade Auction Proceeds Investment Plan".

Dear Chairperson Nichols:

We were fortunate to attend the public workshop in Fresno on February 19, 2013. We were quite impressed with the quality of the panel members on hand to answer questions and the presentation by the State Department heads and Secretaries. The presentations were very thorough and informative. We did recognize two (2) major weaknesses in the Draft Plan.

First, we couldn't help but notice that the "draft" census maps of the San Joaquin Valley, and specifically Fresno County, reportedly illustrating the top 10% disadvantaged communities, by Census zip code, obviously were in error. The current identified communities are limited to *only* Fowler, Kerman, Parlier, Reedley, Riverdale, Sanger and Selma. Certainly from a statewide perspective the Cities of: Coalinga (93210); Firebaugh (93622); Huron (93234); Kingsburg (93631); Mendota (93640); Orange Cove (93646); and San Joaquin (93660) were mistakenly omitted, because these are some of the most disadvantaged Cities in the entire Nation, much less just California (Reference Brookings Institute findings). It is our position that the State and the residents of these disadvantaged communities would be better served if the list of identified disadvantaged communities is modified and or amended to *include* them. These additional economically disadvantaged communities need to be a part of this "Investment Plan" so the plan is complete when addressing the Impact and Vulnerability of the 90th-100th percentile of the poverty indicator by zip codes in the San Joaquin Valley. Otherwise we will continue to have wide spread disparity among these communities in greatest need, while it is the intent and goal of this legislation to identify socio-economic disadvantaged communities and to provide 'fair treatment' to all people through a comprehensive Action Plan. Federal laws and regulations are intended to ensure that "Title VI" and "Environmental Justice" guarantees are included in minority and socio-economic analysis, and resultant plans.

Our second area of concern is that of the example of electrification of heavy duty and light duty vehicles under the Clean Transportation-investment priorities section. It would be a mistake to believe that electric vehicles would be the only recognized alternative fuel worthy of potential funding although this is only an example of such uses. As a general public transit agency, we are experienced with operating a fleet of alternatively fueled vehicles over the past twenty-one (21) years. We want to set the example in finding ways to reduce emissions and reduce air quality pollution in our non-attainment air basin. We have avoided using diesel powered vehicles completely. We utilized Liquid Petroleum Gas (propane) in twenty (20) vehicles for eighteen (18) years, because since the 1930's the San Joaquin Valley is considered the "propane capital of the world". We realized all the reported benefits: cheaper fuel; better MPG; reduced smog test emissions; cleaner oil; and double the engine life. We have also operated a total of eighty-five

(85) compressed natural gas (CNG) powered vehicles. We also operated two (2) 100% electric battery (lead acid) powered vehicles, in weekday fixed route service consistently for over ten (10) years (in temperatures of between 30 and 110 degrees – a feat that cannot be equaled with today's high tech lithium batteries). Seventy-six percent (76%) of our current seventy (70) vehicles are powered by CNG fuel.

We believe that other alternative energy modes need to be included in this 1-3 year Action Plan until such time as proven technology is advanced in this area of vehicle electrification. The current battery and condenser recharging electrification technology is very limited for mass transportation vehicles. We have followed the research and development of potential vehicles in the United States and around the world. In each case they cost twice as much as a conventional alternatively fueled vehicle, require major infrastructure improvements, and the products are subject to frequent failure, major component rebuilding and/or redesign. Manufactures continue to come and go out-of-business, all too frequently. There are simply no electric vehicles on the horizon that can currently serve the rural areas of Fresno County, where our furthest City is seventy (70) miles away, and our transit service travels over one hundred (100) miles through multiple communities during a nearly three (3) hour one-way trip to the urban area. The infrastructure needed for support of electrification will be one of the highest capital investments since there is no existing electrification charging sub-stations in the rural or urbanized areas of Fresno County. We would recommend that this "Investment Plan" include the use of other viable energy modes, such as hydrogen and fuel cells. But we are unclear as to their potential reduced net operating emissions and if the technology is sustainable and cost effective in comparison to the reduction of air pollution. And one final observation, we understand the expectation that if vehicle miles travelled (VMT) are reduced, emissions decline. But if the energy source achieves zero emissions, does VMT remain an issue?

We appreciate your consideration of these comments and the opportunity to work with your staff to affect change with the environment through the vitalization of these disadvantaged communities and residents of Fresno County.

Please contact me at (559) 233-6789 if you have any additional questions or would care to meet with the Mayors of these rural Cities, and the Chairman of the Fresno County Board of Supervisors, who are the FCRTA Board of Directors. Together, we can all be part of the solution.

Sincerely,



Jeffrey D. Webster
General Manager